

LAW OFFICE OF KARIM H. KAMAL
ATTORNEY AT LAW
430 EAST 86TH STREET, SUITE 14B
NEW YORK, NEW YORK 10028

KARIM H. KAMAL, ESQ.

TELEPHONE: 212-586-0510
FACSIMILE: 914-462-3262
EMAIL: khklaw@gmail.com

February 28, 2024

VIA ECF

Hon. Judge Henry J. Ricardo
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: Kamal v Singh, et al. (1:23-cv-05498-JGLC)

Dear Hon. Judge Ricardo:

Counsel for the parties submit this joint letter reporting on the status of the above referenced matter and pursuant to Your Order, Entered: 02/21/2025, Docket # 36.

ORDER: Pursuant to the Court's Order dated September 23, 2024, ECF No. 33, all discovery is scheduled to close on February 21, 2025. Accordingly, the parties are directed to submit a joint status letter on the docket by February 28, 2025 that addresses: (1) the status but not the substance of the parties' settlement discussions to date and whether a referral to the court mediation program is appropriate at this time; and (2) what motions, if any, the parties anticipate filing by the March 21, 2025 dispositive motion deadline. (Signed by Magistrate Judge Henry J Ricardo on 2/21/2025) (rro) (Entered: 02/21/2025)

- (1) Status of Settlement Discussion to date: There have been no settlement discussion. The Court Mediation Program is not appropriate currently.
- (2) Anticipated motion by the parties: Plaintiff intends to file a Motion for Partial Summary Judgment on Liability. Defendant Uber Technologies, Inc., intends to file a Motion for Summary Judgment on Liability. Defendant Singh may file a Motion for Summary Judgement on Liability.

Additionally, counsel for Uber Technologies, Inc., have obtained most of Plaintiff's records, but have come across an issue accessing records for one of Plaintiff's providers. Counsel will address this under separate cover. Counsel for Defendant Singh has processed authorizations for the release of plaintiff's records on multiple occasions but has not been provided with the requested records, particularly records that are relevant to plaintiff's claimed psych injuries. Defendant Singh has not waived its right to receipt of those records.

- (3) An Independent Psychiatric Evaluation of the plaintiff was previously scheduled on 2 prior occasions by the defendants and subsequently adjourned and the first being rescheduled due to the doctor's tardiness and at plaintiff's request. The next Independent Medical Examination is scheduled on March 14, 2025, at 5:00 p.m. The defendants have not waived their rights to the completion of this Psychiatric Evaluation.

The Honorable Henry J. Ricardo

November 22, 2023

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Your attention to this matter is greatly appreciated. If you have any further questions or concerns, please contact the undersigned.

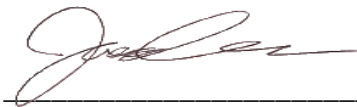
Respectfully submitted,

Karim Kamal, Esq.

Karim H. Kamal
Law Office of Karim H. Kamal
Attorney for Plaintiff
430 East 86th Street, Suite 14B
New York, NY 10028



Barry Mctiernan & Moore
Atts for Defendants Singh & ATIC
101 Greenwich Street, 14th Floor
New York, NY 10006
Main: 212-313-3600
Direct: 212-313-3653



Weber Gallagher Simpson
Stapleton Fires & Newby, LLP
Attorneys for Defendant Uber Technologies
1500 Broadway, Suite 2401
New York, NY 10036